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AO 91 (Rev. 11/11) Criminal Complaint

AUSA Edward A. Liva, Jr. (312) 886-7647

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JAN 16 2020

M. DAVID WEISMAN
MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA

v.

EUGENE HOBSON

CASE NUMBER:
UNDER SEAL**20CR0037****MAGISTRATE JUDGE WEISMAN****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about January 10, 2020, and on or about January 15, 2020, in the Northern District of Illinois, Eastern Division, the defendant violated:

Code Section

Title 18, United States Code, Section 875(d)

Offense Description

Defendant transmitted in interstate commerce communications containing threats to injure the reputation of the addressee with the intent to extort money from the addressee.

This criminal complaint is based upon these facts:

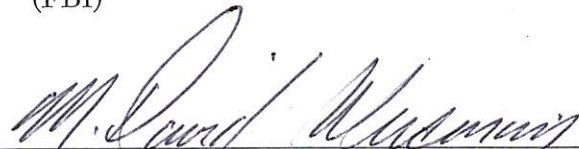
X Continued on the attached sheet.


STEVEN MOLESKY

Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: January 16, 2020


Judge's signature

City and state: Chicago, Illinois

M. DAVID WEISMAN, U.S. Magistrate Judge
Printed name and Title

INTAKE

JAN 17 2020 ✓

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, STEVEN MOLESKY, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed since approximately May 2008. I am currently assigned to the FBI Violent Crime/Fugitive Task Force, which investigates violent crimes such as bank robberies, armed robberies, kidnappings, fugitives, and threats.

2. This affidavit is submitted in support of a criminal complaint alleging that EUGENE HOBSON has violated Title 18, United States Code, Section 875(d). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging HOBSON with extortion, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, witness interviews, my review of audio recordings and text messages, and my experience and training, and the experience of other law enforcement agents.

I. FACTS SUPPORTING PROBABLE CAUSE

4. In summary, from the Northern District of Illinois, HOBSON has transmitted in interstate commerce communications containing threats to injure the

reputation of Victim A, with the intent to extort money from Victim A, in violation of Title 18, United States Code, Section 875(d) (the “**Subject Offense**”).

5. Since January 2020, the FBI has conducted an investigation of the **Subject Offense**. Below, I outline the facts surrounding the **Subject Offense** and the evidence obtained through this investigation that is sufficient for establishing probable cause to believe that HOBSON committed the **Subject Offense**.

March 2018 Meeting Between Victim A and EUGENE HOBSON in Chicago

6. According to Victim A, Victim A resides in a State outside of Illinois and works for a company that is headquartered in Chicago, Illinois. Victim A is married to a woman (Individual A) and has a child (Individual B).

7. According to Victim A, during a work trip to Chicago in March 2018, Victim A searched for a male escort on Craigslist, while Victim A was staying at a hotel in Chicago. According to Victim A, Victim A communicated with a male escort, and the escort—later identified by Victim A as EUGENE HOBSON, as described below—came to the hotel in Chicago where Victim A was staying.¹ According to Victim A, Victim A and HOBSON engaged in sexual activity at the hotel, and Victim A paid HOBSON in exchange for the sexual activity. According to Victim A, Victim A paid for an Uber for HOBSON when HOBSON left the hotel.

¹ According to Victim A, Victim A requested HOBSON to bring cocaine for personal use during their encounter. HOBSON did not bring cocaine to the meeting. Victim A is represented by counsel and has requested immunity for any criminal exposure related to this activity. The government has agreed to provide Victim A with immunity for any possible criminal exposure based on the reported conduct. Victim A has no criminal history and no other promises have been made to Victim A.

8. According to Victim A, within approximately forty-five minutes to one hour of the consensual sexual activity, Victim A received text messages and phone calls from HOBSON, which text messages contained screen shots of Victim A's Facebook and LinkedIn profiles. According to Victim A, HOBSON instructed Victim A to download a mobile payment app called CashApp and to make a payment to HOBSON. According to Victim A, HOBSON indicated that he had recorded their sexual activity and threatened to expose Victim A to Victim A's family. According to Victim A, Victim A paid HOBSON in response to the initial demand.

Identification of EUGENE HOBSON

9. According to Victim A, HOBSON continued to demand payments from Victim A since the initial demand in March 2018. According to Victim A and bank records, Victim A has made multiple payments to HOBSON, using various cash payment apps, including CashApp, Google Pay, and Zelle. According to Victim A, the most recent payment occurred on or about January 15, 2020.

10. According to Victim A, on or about December 31, 2019, Victim A made a payment of \$500 to "Shariah w" via the cash payment app Zelle, pursuant to instructions from HOBSON. According to Victim A, at the time of the payment, Victim A did not know HOBSON's identity, but the Zelle receipt included the email address eugenehobsonXXXX@gmail.com.² Victim A provided a screen shot of the receipt to law enforcement.

² The full email address has been redacted for privacy reasons.

11. According to Victim A, after running public internet searches, Victim A identified a photograph of EUGENE HOBSON at the following website:

https://www.rapsheetz.com/illinois/chicago-jail/HOBSON_EUGENE/16889468.

According to Victim A, the photograph of EUGENE HOBSON on the website matched the identity of the male escort with whom Victim A engaged in sexual activity in March 2018.

12. According to a screen shot of another Zelle receipt provided by Victim A to law enforcement, the phone number XXX-XXX-9808³ was listed as belonging to a Zelle account to which Victim A made a payment, at the demand of HOBSON. According to records provided by Sprint, the number XXX-XXX-9808 has been subscribed to EUGENE HOBSON since the account was opened on or about September 23, 2016.

Communications With and Payments to HOBSON

13. According to Victim A, for a period of nearly two years HOBSON has repeatedly threatened to expose Victim A to Victim A's family and has sent Facebook pictures of Victim A's family, Individual A and Individual B, to Victim A.

14. According to Victim A, HOBSON has also threatened to expose Victim A to Victim A's work colleagues and contacted Victim A's work assistant ("Individual C") in or around October 2018, informing Individual C that Victim A had assaulted HOBSON and that HOBSON needed money.

³ The full phone number has been redacted for privacy reasons.

15. According to Victim A, HOBSON left a threatening voicemail on Victim A's phone on or about September 9, 2019. According to Victim A, Victim A was in Massachusetts at the time the voicemail was left on Victim A's phone. During the recording, which I have listened to, HOBSON told Victim A: "You better call me the fuck back right now. . . . I will tell [Individual B] and I will tell [Individual A] about everything that's going on. . . . You need to call me back right now or send me my money. . . . I will send to [Individual C] as well."⁴ According to Victim A, the voice of the individual on the voicemail matched the voice of the male escort with whom Victim A engaged in sexual activity in March 2018.

16. According to audio recordings of phone calls from on or about January 10, 2020 between HOBSON and Victim A, which I have listened to, HOBSON threatened to send a video of Victim A and HOBSON's sexual activity to Victim A's spouse, Individual A. Specifically, Victim A, who was located in Massachusetts at the time, and HOBSON, who was located in the Northern District of Illinois⁵, engaged in the following communications:

VICTIM A: Leave my wife alone. What are you gonna do? Don't do shit.

⁴ The investigation included the use of consensually reviewed text messages, recorded telephone calls, and payment receipts provided by Victim A. The summaries of the recorded conversations are based on communications by Victim A and Victim A's counsel to law enforcement. The language that is quoted from the recorded conversations throughout this affidavit is based upon a preliminary review, not final transcripts, translations, or interpretations, of the recorded conversations. The times listed for the recorded conversations are approximate. The summaries do not include all potentially criminal communications or topics covered during the course of the recorded conversations.

⁵ Cell phone data for a phone subscribed to HOBSON indicates that the cell phone was located in the Northern District of Illinois on January 10, 2020.

HOBSON: I'm gonna send her the video.

VICTIM A: You're gonna what? What video?

HOBSON: [inaudible] the hotel.

VICTIM A: What video?

HOBSON: You know the video I have [inaudible].

...

HOBSON: I'll send it now. Bye.

17. In a subsequent recorded call on or about January 10, 2020, HOBSON instructed Victim A to pay HOBSON \$300. According to Victim A, in response to HOBSON's demand, Victim A paid HOBSON \$300 via Zelle, on or about January 10, 2020.

18. On or about January 15, 2020, HOBSON, who was located in the Northern District of Illinois⁶, again communicated with Victim A, who was again located in Massachusetts, regarding another payment from Victim A to HOBSON. During a recorded call on or about January 15, 2020, which I have listened to, HOBSON indicated that HOBSON and Victim A had a "deal" in which Victim A was supposed to pay HOBSON on January 15. After Victim A indicated that he could not "keep doing this," and that "I need this to end," HOBSON stated that "I help you keep your family." HOBSON referenced "not posting [Victim A's] pictures on the internet" and stated that the "fact that you still lay up with [Individual A] everyday" and are

⁶ Cell phone data for a phone subscribed to HOBSON indicates that the cell phone was located in the Northern District of Illinois on January 15, 2020.

“able to see [Individual B] is because of me.” According to Victim A, Victim A made a payment of approximately \$500 to HOBSON after the call. According to Victim A, the call ended at approximately 1:46 p.m. Geolocation data obtained from Facebook indicates that an account believed to belong to HOBSON was accessed from a location in the Northern District of Illinois at approximately 1:54 p.m.

II. CONCLUSION

19. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that, on or about January 10, 2020 and on or about January 15, 2020, EUGENE HOBSON transmitted in interstate commerce communications containing threats to injure the reputation of Victim A, with the intent to extort money from Victim A, in violation of Title 18, United States Code, Section 875(d).

FURTHER AFFIANT SAYETH NOT.


STEVEN MOLESKY
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on January 16, 2020.


M. DAVID WEISMAN
United States Magistrate Judge